

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DONNA SCOTT

Plaintiff,

v.

THE UNION CENTRAL LIFE
INSURANCE COMPANY

Defendant.

: Case No. C-1-02-075

: Judge Weber

: **DEFENDANT'S EXHIBIT LIST**

| Exhibit No. | Date Issued | Date Offered | Obj. | Adm. | Description of Exhibits |
|-------------|-------------|--------------|------|------|---|
| A. | | | | | August 18, 1998 Memorandum from Rick Pretty to the Annuity Service Team regarding teamwork |
| B. | | | | | November 13, 2000 Letter from Donna Scott to Norbert Vadus with envelope |
| C. | | | | | August 16, 1999 Letter from Donna Scott to Ruby F. Turner |
| D. | | | | | Transcript of Unemployment Compensation File |
| E. | | | | | Donna Scott Personnel File |
| F. | | | | | September 10, 2002 Decision of Judge Steven E. Martin |
| G. | | | | | November 14, 2001 Letter from the U.S. Equal Employment Opportunity Commission to Donna Scott |
| H. | | | | | 1996 E-Mails and Notes regarding NASD Series 6 Examination |
| I. | | | | | May 1998 E-Mails and Letters regarding Donna Scott's workload |
| J. | | | | | Undated Memorandum Titled "Golden Key Award" |

| | | | | | |
|----|--|--|--|--|--|
| K. | | | | | January 27, 1999 Letter from Susan Carpenter to Donna Scott |
| L. | | | | | March 18, 1999 E-Mails regarding "Cheesecake" pictures |
| M. | | | | | Undated Notes of Donna Scott regarding other jobs |
| N. | | | | | September 3, 1999 E-Mails between Donna Scott and Becky Deppen regarding Support Unit Position |
| O. | | | | | Becky Deppen's Notes regarding complaints about Donna Scott |
| P. | | | | | Union Central Salary Data - April 28, 1999 |
| Q. | | | | | Miscellaneous 2001 E-Mail messages |
| R. | | | | | April 28, 1999 Notes of Donna Scott |
| S. | | | | | Miscellaneous 2000 E-Mail messages and Correspondence |
| T. | | | | | Total Calls In/Out |
| U. | | | | | March 6, 2003 E-Mail from Molly Swami to Becky Deppen |

Defendant reserves the right to amend this list, introduce any of Plaintiff's exhibits, and introduce rebuttal exhibits as necessary.

Respectfully submitted,

/s/ Michael J. Newman
Deborah DeLong, Esq. (0014174)
Michael J. Newman, Esq. (0042684)
DINSMORE & SHOHL LLP
1900 Chemed Center
255 East Fifth St.
Cincinnati, OH 45202
(513) 977-8200 (Phone)
(513) 977-8141 (Fax)

Attorneys for Defendant, The Union Central
Life Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2004, a copy of the foregoing was filed electronically and faxed to Plaintiff's counsel, Randolph H. Freking, Esq. and George M. Reul, Jr., Esq. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Michael J. Newman

Michael J. Newman (0042684)